

**Ibari Anaele**  
PO Box 25042  
Newark, NJ 07101

U.S. BANKRUPTCY COURT  
FILED  
NEWARK, NJ

2017 AUG 25 P 3:46

JEANNE A. NAUGHTON

BY:   
DEPUTY CLERK

August 25, 2017

Honorable Stacey L. Meisel  
United States Bankruptcy Court  
50 Walnut Street, 3rd Floor  
Newark, NJ 07102

VIA: Hand Delivery

Re: Case No. 16-29746 (SLM)/ Ibari Anaele | **Response**  
Hearing Date: August 29, 2017 at 10:00 a.m.

Dear Judge Meisel:

I am the Debtor, pro se, in this Chapter 7 Bankruptcy Action and am utilizing this letter to further sway the court to grant my requested motion, against my Trustee's opposition.

**Background and Relevant Facts**

I signed a retainer with Andre Micklin of Underwood & Micklin, PC July 2017. Micklin filed a Chapter 7 Bankruptcy petition on my behalf on October 16, 2016. Micklin requested to be dismissed from this case and request was granted on May 26, 2017.

At Meeting of Creditors, November 2016 some circumstances required clarification for which items were sent to the Trustee via my then Attorney, Andrew Micklin and a plethora of information was provided by me at the deposition of February 2017.

On August 8, 2017, I filed a motion to dismiss the Chapter 7 Petition. On August 25, 2017, I filed an amended motion to dismiss with stipulation that I continue to negotiate with all creditors in good faith and make payment satisfactory to the creditor and courts Rule 41.

In violation of Ethics Rule 9011, Trustee, Barry Roy irresponsibly drafted using inflammatory language in his letter brief on August 21, 2007 in opposition of my motion.

On August 23, 2017, I was advised by Trustee by email that he requested an 11<sup>th</sup> hour deposition of my ex-husband.

As I stated in your court this July, I will be moving my family out-of-state. As a result, I will be selling my residence. The status of this case is causing greater hardship to both my creditors. I am currently enrolled as a full-time student with 5 classes, one of which is a capstone, raising two children on my own, caring for an elderly parent and seeking full-time employment.

**Legal Standard and Relief Requested**

I am asking the court to grant my Motion to Dismiss with stipulation under Rule 41. Dismissal of Actions. My creditors will not be adversely affected. Furthermore, I have begun negotiating my debts to have everything paid in full within 6 -12 months.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ibari Anaele', with a stylized, cursive script.

Ibari Anaele